

State Farm breached its contract with Plaintiffs and acted in bad faith, for which Plaintiffs seek recovery of the bad faith penalty.

3. Plaintiffs' Complaint requests actual damages in the amount of \$366,375, along with the alleged statutory bad faith penalty of 25%.

4. State Farm is a corporation organized and existing under the laws of Illinois with its principal place of business in the State of Illinois.

5. This Court has jurisdiction over the claims in the Complaint pursuant to 28 U.S.C. 1332 (diversity) because there is complete diversity between Plaintiffs and Defendant.

6. This notice of removal is being filed within thirty days of September 11, 2017, the date on which the summons and Complaint were first served on State Farm. Thus, this notice of removal is filed within thirty days after State Farm first received a copy of the initial pleading setting forth the claims for relief.

7. Pursuant to 28 U.S.C. § 1446(d), defendant will promptly give notice of this notice of removal to the Clerk of Scott County Chancery Court and to counsel for Plaintiff in the state court proceeding. The giving of such notice will effect this removal pursuant to 28 U.S.C. § 1446(b). A copy of the state court notice is attached as **Exhibit B**.

8. By removing this action, State Farm does not waive any defenses available to it in federal or state court and expressly reserves the right to assert all such defenses in its responsive pleading.

WHEREFORE, State Farm requests that further proceedings of the Scott County Chancery Court be discontinued and that this action be removed in its entirety to the United States District Court for the Eastern District of Tennessee at Knoxville.

Respectfully submitted this 21st day of September, 2017.

PAINE | BICKERS LLP

/s/ Matthew J. Evans

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2017, the foregoing *Notice of Removal* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

/s/ Matthew J. Evans

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